

Date: 6/1/06

To: U.S. District Court
Room 4209- Office of Clerk of the Court

05-452 (JJF)

Reference: Civil Action No.: 05-452-JJF (Age/Disability Claim), Hill v. Superfresh

Subject: Request for Scheduling Order (Rule 16)

In response to the 5/19/06 order by the Honorable Judge Farnan, the following scheduling order is proposed.

1. Pre-Discovery Disclosures

Recommend the parties will exchange by 6/30/06 the information required in Rule 26 (a) (1).

2. Joinder of Other Parties

All motions to join other parties shall be filed by 6/30/06.

3. With respect to a possible settlement, please furnish the contact information for Judge Thyng.

4. Discovery

(a) Exchange and completion of interrogatories, identification of all fact witnesses and document production shall be commenced so as to be completed by 7/31/06.

(b) Maximum of 10 interrogatories by each party to any other party.

(c) Maximum of 3 requests for admission by each party to any other party.

(d) Maximum of 2 depositions by plaintiff and defendant.

(e) Reports from retained experts are due from the plaintiff and defendant by 7/31/06.

5. No response.

6. Amendment of the Pleadings

All motions to amend the pleadings shall be filed on or before 6/30/06.

Sincerely,

James Hill

James Hill



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